

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CAN'T STOP PRODUCTIONS, INC.,

Plaintiff,

7:17-cv-06513-CS

-against-

**SIXUVUS, LTD., ERIC ANZALONE,
ALEXANDER BRILEY, FELIPE ROSE,
JAMES F. NEWMAN, RAYMOND SIMPSON,
and WILLIAM WHITEFIELD,**

Defendants,

**DECLARATION OF KAREN L.
WILLIS IN SUPPORT OF NEWLY
DISCOVERED FACTS THAT
RENDERS THE SETTLEMENT VOID**

**KAREN L. WILLIS dba HARLEM WEST
ENTERTAINMENT**

Intervenor.

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I, Karen L. Willis, under penalty of perjury, swears to the truth of the following statements:

1. I, Karen L. Willis, doing business as Harlem West Entertainment, am the Intervenor in this action and make this declaration in support of newly discovered facts which weigh heavily against the alleged settlement agreement being enforced because a material party to the agreement can no longer fulfill his obligation with the Kings of Disco therefore the alleged settlement agreement is now void and/or avoidable. Notwithstanding this declaration, the court lack jurisdiction to hear defendants motion to enforce the settlement agreement.

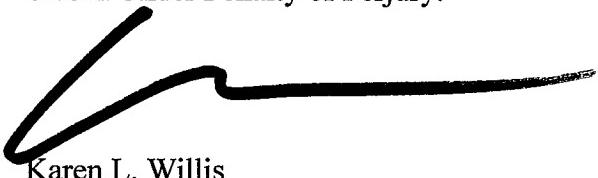
2. On or about May 2018, Felipe Rose made contact me, informing me that he was no longer part of the so called "Kings of Disco." Mr. Rose further informed me that he had notified the Sixuvus and their counsel of his resignation from the Kings of Disco prior to the Sixuvus filing of their motion to enforce the settlement agreement wherein he is a material part thereof. Mr. Rose also informed me that the Sixuvus counsel did not provide him a copy of the settlement agreement and that he has not received any communications from the Sixuvus counsel for several months now. Yet they continued to falsely represent that Mr. Rose had an interest in the settlement agreement when in fact, he did not.

3. On or about July 3, 2018, Felipe Rose informed me that he had also resigned his position as a member of the Board of the Sixuvus, Ltd, effective June 22, 2018. He further informed me that the Sixuvus, and their counsel, likewise had knowledge of Mr. Rose's resignation from the Sixuvus, Ltd., since at least June 22, 2018. See Exhibit A. Yet, neither the Sixuvus nor its counsel has informed the court that a material part of the settlement agreement they seek to enforce cannot be joined with the Kings of Disco as part of the settlement because

he is no longer a member of the Kings of Disco. Therefore, the settlement as currently constituted does not allow for anyone other than Felipe Rose to dress in full Native American gear as part of the Kings of Disco pursuant to Can't Stop's Village People trademarks.

4. Accordingly, a material aspect of the settlement cannot be joined for purposes of the settlement, as Mr. Rose is no longer part of the Kings of Disco, and I am not interested excusing Mr. Rose's performance. The settlement is therefore void.

Sworn Under Penalty of Perjury.

A handwritten signature in black ink, appearing to read "Karen L. Willis".

Karen L. Willis

July 9, 2018

EXHIBIT A

June 22nd, 2018

Dear Gentlemen:

I hope this correspondence finds you well. I am submitting Officially Resignation effective immediately as President and board member of Sixuvus Ltd. This is to be submitted as a legal binding document to all attorneys and respected parties.

Sixuvus Ltd is now operating under Kings of Disco Ltd, therefore releasing me of any further litigation connected with this corporation, but not in name as Felipe Rose. I will submit documents to all proper parties and attorneys representing my interest.

I want to thank you for the 40 wonderful years and honorable legacy!

Best of luck – Life is Disco!

Respectfully

Felipe Rose

Cc:

Richard A. Catalina, Jr. – Hill Wallack LLP

Howard krantz

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